

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Inquiry Concerning Deployment of Advanced)	GN Docket No. 17-199
Telecommunications Capability to All Americans)	
in a Reasonable and Timely Fashion)	

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF TELECOMMUNICATIONS
OFFICERS AND ADVISORS**

The National Association of Telecommunications Officers and Advisors (“NATOA”) submits these comments in response to the above-captioned Thirteenth Section 706 Report Notice of Inquiry (“NOI”), released August 8, 2017.¹ NATOA’s membership includes (1) local government officials and staff members from across the nation whose responsibility is to develop and administer communications policy and the provision of communications services for their communities; (2) communities that operate broadband wireline and wireless infrastructure for anchor institutions – serving the needs of government, schools, libraries, first responders, and emergency support personnel; and (3) communities that have constructed, or are in the course of

¹ *In the Matter of Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Thirteenth Section 706 Report Notice of Inquiry, GN Docket No. 17-199, FCC 17-109 (August 8, 2017).

constructing broadband infrastructure to meet public needs, or are offering broadband services to the public within their jurisdictions. These members manage networks in urban, suburban, and rural areas across America.

NATOA and its members are representatives of the American people in the most fundamental and immediate sense. We are local governments and agencies, working directly with our respective communities to ensure that they have the most advanced communications services they need to compete in a global economy and better serve the needs of their residents. At the local level, we are in the unique position to understand what true, affordable broadband access might mean for our citizens and our communities.

America's local governments recognize broadband as critical infrastructure – a utility that is essential to economic and community development. Every year, the demand grows for faster speeds and more capacity. It is imperative that our definition of broadband keeps pace with the extraordinary growth of Internet usage and must account for – and enable – future growth and innovation. The failure to do so will hinder our ability as a nation to compete with nations abroad that have outpaced us in their deployment of high capacity broadband.

It is important to protect the trust of American consumers and to establish a definition for broadband that will support the applications available in the marketplace today, as well as rapidly emerging technologies and applications for teleworking, distance learning, and telemedicine. Like members of Congress, we are “concerned with any effort to weaken the FCC’s current policy finding that every American should have access to broadband services with speeds of at least 25 Mbps download/3 Mbps upload.”² With this in mind, we support the

² Letter from Representative Jared Huffman, Senator Al Franken, Representative Mark Pocan, Representative Keith Ellison, Senator Edward J. Markey, Senator Brian Schatz, Senator Ron Wyden, Senator Chris Van Hollen, Senator Maggie Hassan, Senator Heidi Heitkamp, Senator Richard Blumenthal, Senator Kirsten Gillibrand, Representative Cheri Bustos, Representative David Cicilline, Representative Earl Blumenauer, Representative Ro Khanna,

Commission's continued use of the current speed benchmark of 25 Mbps/3 Mbps down/upload for fixed services.

However, we believe these speeds are too low.³ While the current benchmark may be appropriate based on today's applications and needs, these requirements are continually changing and applications are emerging that demand far greater capacity. As a result, our national definition of broadband must keep pace with the extraordinary growth and innovation for current and future Internet use. This is why we again urge the Commission to avoid establishing a static point at which to gauge the progress and growth in the broadband market from one report to another. By doing so, the Commission will ensure that broadband in the United States stays on par with international standards and keeps pace with consumer demands and technological developments.

Furthermore, we urge the Commission to take a closer, more granular examination of where advanced services are being deployed and to whom. For example, the City of New York argues that the Commission "should measure deployment of fixed broadband to particular addresses, and compare deployment in the subset of all U.S. addresses year-over-year."⁴ Recent allegations of discriminatory deployment of advanced services in lower-income communities,

Representative Jared Polis, Representative Sanford Bishop, Representative Mark DeSaulnier, Representative Colleen Hanabusa, Representative John Conyers, Representative Mike Thompson, Representative Raul Grijavia, Representative Louise Slaughter, Representative Anna Eshoo, Representative James McGovern, Representative Paul Tonko, Representative Peter Welch, Representative Seth Moulton, Representative Chellie Pingree, Representative John Lewis, Representative Batty McCollum, Representative Jose Serrano, Representative Gwen Moore, Representative Michael Doyle, Representative John Garamendi, Representative Tulsi Gabbard, Representative Sheila Jackson Lee, Representative Alcee Hastings, Representative Darren Soto, Representative Emanuel Cleaver, Representative Timothy Walz, Representative Tom O'Halleran, Representative John Yarmuth, and Representative Rick Nolan. *Also, see* Comments of the City of Tukwila.

³ *Also, see* Comments of the City of New York.

⁴ *Id.*

such as Cleveland, simply underscore the need for better, more accurate mapping of providers' coverage areas.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Traylor", written in a cursive style.

Stephen Traylor
Executive Director
NATOA
3213 Duke Street, #695
Alexandria, VA 22314
(703) 519-8035

October 6, 2017